



Kelly Purcaro, Partner
One Riverfront Plaza
1037 Raymond Blvd., Suite 900
Newark, New Jersey 07102
Phone: 732.494.4800
Fax: 954.333.4222
Direct Phone: 732.456.8734
Direct Fax: 732.957.2298
Email: kelly.purcaro@gmlaw.com

June 3, 2025

BY ECF

Honorable Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Re: *Atlas Data Privacy Corp., et al. v. Searchbug, Inc. et al.*
Case No. 1:24-cv-05658-HB
Joinder in Defendants' Reply on Consolidated Motion to Dismiss

Dear Judge Bartle:

This firm represents the defendant Searchbug, Inc. ("Defendant") in the above-referenced matter. We write to advise the Court that Defendant joins the Consolidated Motion to Dismiss Reply Brief, which was filed under Dkt. No. 72 in the action captioned as *Atlas Data Privacy Corp. v. DM Group Inc.*, Case No. 24-cv-04075-HB. For the reasons set forth in the opening brief as well as the reply on the Consolidated Motion to Dismiss, Defendant respectfully requests that the Court grant the Motion and dismiss Plaintiffs' Complaint in this matter with prejudice.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kelly M. Purcaro".

KELLY PURCARO